

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	<b>Re: Docket No. 221</b>
	:	
	X	

**CERTIFICATION OF COUNSEL REGARDING ORDER (I) ESTABLISHING  
A GENERAL BAR DATE TO FILE PROOFS OF CLAIM, (II) ESTABLISHING  
A BAR DATE TO FILE PROOFS OF CLAIM BY GOVERNMENTAL UNITS,  
(III) ESTABLISHING A REJECTION DAMAGES BAR DATE, (IV)  
ESTABLISHING AN AMENDED SCHEDULES BAR DATE, (V) APPROVING  
THE FORM AND MANNER FOR FILING PROOFS OF CLAIM, (VI) APPROVING  
THE PROPOSED NOTICES OF BAR DATES, (VII) APPROVING PROCEDURES  
WITH RESPECT TO SERVICE OF THE PROPOSED NOTICE OF BAR  
DATES, AND (VIII) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On July 25, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed the *Motion of Debtors for Entry of Order (I) Establishing a General Bar Date to File Proofs of Claim, (II) Establishing a Bar Date to File Proofs of Claim By Governmental Units, (III) Establishing a Rejection Damages Bar Date, (IV) Establishing an Amended Schedules Bar Date, (V) Approving the Form and Manner for Filing Proofs of Claim, (VI) Approving the Proposed Notices of Bar Dates, (VII) Approving Procedures With Respect to Service of the Proposed Notice*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

*of Bar Dates, and (VIII) Granting Related Relief*[Docket No. 221] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached thereto as **Exhibit A** was a proposed form of order granting the relief requested in the Motion (the “**Proposed Order**”).

2. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, objections or responses to the relief requested in the Motion, if any, were to be made in writing and filed with the Court on or before August 8, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”).

3. Prior to the Objection Deadline, the Debtors received certain informal comments to the relief requested in the Motion (the “**Comments**”) from (i) the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) and (ii) Chubb Companies (“**Chubb**”). Other than the Comments, the Debtors received no other informal responses to the Motion, and no objection or responsive pleading to the Motion has appeared on the Court’s docket in the Chapter 11 Cases.

4. To resolve the Comments, the Debtors have prepared the revised form of Proposed Order (the “**Revised Order**”) attached hereto as **Exhibit 1**. The Revised Order has been circulated to the U.S. Trustee and Chubb, and the U.S. Trustee and Chubb do not object to the entry of the Revised Order. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Revised Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: August 11, 2025  
Wilmington, Delaware

/s/ Clint M. Carlisle

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